

EXHIBIT 1

INTRODUCTION

Respondent Omar Bradley was a candidate for Mayor of the City of Compton in the April 17, 2001, election, and in the June 5, 2001, run-off election. Respondent Bradley previously served as Mayor of the City of Compton from 1993 until his defeat in the June 5, 2001, run-off election. Respondents Committee to Elect Omar Bradley, Committee to Re-elect Omar Bradley Mayor, and Friends of Omar Bradley were controlled committees of Respondent Bradley.

Respondents had a duty to file periodic campaign statements, disclosing contributions received and expenditures made. Respondents Omar Bradley, Committee to Elect Omar Bradley, Committee to Re-elect Omar Bradley Mayor, and Friends of Omar Bradley failed to file semi-annual campaign statements for a period of five years. In addition, Respondents failed to file pre-election campaign statements prior to the April 17, 2001 mayoral election in the City of Compton, and prior to the June 5, 2001, run-off mayoral election in the City of Compton.

For purposes of this Default, Decision and Order, Respondents' violations of the Political Reform Act (the "Act")¹ are as follows:

- COUNT 1: On or about July 31, 1999, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 1999, through June 30, 1999, in violation of section 84200, subdivision (a).
- COUNT 2: On or about July 31, 1999, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period January 1, 1999, through June 30, 1999, in violation of section 84200, subdivision (a).
- COUNT 3: On or about July 31, 1999, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 1999, through June 30, 1999, in violation of section 84200, subdivision (a).
- COUNT 4: On or about January 31, 2000, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 1999, through December 31, 1999, in violation of section 84200, subdivision (a).

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of title 2 of the California Code of Regulations. All regulatory references are to title 2, division 6 of the California Code of Regulations, unless otherwise indicated.

- COUNT 5: On or about January 31, 2000, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period July 1, 1999, through December 31, 1999, in violation of section 84200, subdivision (a).
- COUNT 6: On or about January 31, 2000, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 1999, through December 31, 1999, in violation of section 84200, subdivision (a).
- COUNT 7: On or about July 31, 2000, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 2000, through June 30, 2000, in violation of section 84200, subdivision (a).
- COUNT 8: On or about July 31, 2000, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period January 1, 2000, through June 30, 2000, in violation of section 84200, subdivision (a).
- COUNT 9: On or about July 31, 2000, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 2000, through June 30, 2000, in violation of section 84200, subdivision (a).
- COUNT 10: On or about January 31, 2001, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2000, through December 31, 2000, in violation of section 84200, subdivision (a).
- COUNT 11: On or about January 31, 2001, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period July 1, 2000, through December 31, 2000, in violation of section 84200, subdivision (a).
- COUNT 12: On or about January 31, 2001, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2000, through December 31, 2000, in violation of section 84200, subdivision (a).
- COUNT 13: On or about March 8, 2001, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a first pre-election campaign statement for the reporting period January 1, 2001, through March 3, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (a).

- COUNT 14: On or about March 8, 2001, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a first pre-election campaign statement for the reporting period January 1, 2001, through March 3, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (a).
- COUNT 15: On or about March 8, 2001, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a first pre-election campaign statement for the reporting period January 1, 2001, through March 3, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (a).
- COUNT 16: On or about April 5, 2001, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a second pre-election statement for the period March 4, 2001, through March 31, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (b).
- COUNT 17: On or about April 5, 2001, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a second pre-election statement for the period March 4, 2001, through March 31, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (b).
- COUNT 18: On or about April 5, 2001, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a second pre-election statement for the period March 4, 2001, through March 31, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (b).
- COUNT 19: On or about May 24, 2001, Omar Bradley and Committee to Elect Omar Bradley failed to timely file a pre-election campaign statement for the period April 1, 2001, through May 19, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (c).
- COUNT 20: On or about May 24, 2001, Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a pre-election campaign statement for the period April 1, 2001, through May 19, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (c).
- COUNT 21: On or about May 24, 2001, Omar Bradley and Friends of Omar Bradley failed to timely file a pre-election campaign statement for the period April 1, 2001, through May 19, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (c).
- COUNT 22: On or about July 31, 2001, Respondents Omar Bradley and Committee to

Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period May 20, 2001, through June 30, 2001, in violation of section 84200, subdivision (a).

COUNT 23: On or about July 31, 2001, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period May 20, 2001, through June 30, 2001, in violation of section 84200, subdivision (a).

COUNT 24: On or about July 31, 2001, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period May 20, 2001, through June 30, 2001, in violation of section 84200, subdivision (a).

COUNT 25: On or about January 31, 2002, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2001, through December 31, 2001, in violation of section 84200, subdivision (a).

COUNT 26: On or about January 31, 2002, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period July 1, 2001, through December 31, 2001, in violation of section 84200, subdivision (a).

COUNT 27: On or about January 31, 2002, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2001, through December 31, 2001, in violation of section 84200, subdivision (a).

COUNT 28: On or about July 31, 2002, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 2002, through June 30, 2002, in violation of section 84200, subdivision (a).

COUNT 29: On or about July 31, 2002, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period January 1, 2002, through June 30, 2002, in violation of section 84200, subdivision (a).

COUNT 30: On or about July 31, 2002, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 2002, through June 30, 2002, in violation of section 84200, subdivision (a).

COUNT 31: On or about January 31, 2003, Respondents Omar Bradley and Committee

to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2002, through December 31, 2002, in violation of section 84200, subdivision (a).

COUNT 32: On or about January 31, 2003, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period July 1, 2002, through December 31, 2002, in violation of section 84200, subdivision (a).

COUNT 33: On or about January 31, 2003, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2002, through December 31, 2002, in violation of section 84200, subdivision (a).

COUNT 34: On or about July 31, 2003, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 2003, through June 30, 2003, in violation of section 84200, subdivision (a).

COUNT 35: On or about July 31, 2003, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period January 1, 2003, through June 30, 2003, in violation of section 84200, subdivision (a).

COUNT 36: On or about July 31, 2003, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period January 1, 2003, through June 30, 2003, in violation of section 84200, subdivision (a).

COUNT 37: On or about January 31, 2004, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2003, through December 31, 2003, in violation of section 84200, subdivision (a).

COUNT 38: On or about January 31, 2004, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to timely file a semi-annual campaign statement for the period July 1, 2003, through December 31, 2003, in violation of section 84200, subdivision (a).

COUNT 39: On or about January 31, 2004, Respondents Omar Bradley and Friends of Omar Bradley failed to timely file a semi-annual campaign statement for the period July 1, 2003, through December 31, 2003, in violation of section 84200, subdivision (a).

PROCEDURAL HISTORY

On June 17, 2004, the Enforcement Division initiated an enforcement action against Respondent Omar Bradley by serving him at North Kern State Prison with a Report in Support of a Finding of Probable Cause (“probable cause report”) by personal service. Along with the probable cause report, Respondent was also served with an information packet informing Respondent that he had 21 days in which to request a probable cause conference and to file a written response to the probable cause report. In a letter dated August 24, 2004, Respondent affirmatively waived his right to a probable cause conference.

On September 14, 2004, the Enforcement Division filed an Ex Parte Request for a Finding of Probable Cause and an Order That an Accusation Be Prepared and Served, and sent a copy to Respondent at his mailing address. On September 21, 2004, Executive Director Mark Krausse issued an Order Finding Probable Cause (see “Exhibit A”) as to the 39 counts alleged in the probable cause report. A copy of the order was sent to Respondent’s mailing address.

Pursuant to the California Administrative Procedure Act (the “APA”),² a respondent is entitled to a hearing on the merits of an Accusation if the respondent files a Notice of Defense within 15 days after service of the Accusation. (Section 11506.) The APA further provides that the respondent’s failure to file a Notice of Defense within 15 days after service of an Accusation constitutes a waiver of the respondent’s right to a hearing. (Section 11506, subdivision (c).) A default decision may be issued if the respondent fails to file a Notice of Defense within 15 days of service of the Accusation. (Section 11520, subdivision (a).)

The Accusation (see “Exhibit B”) in this matter was delivered on April 24, 2005, to the Respondent’s mailing address of 1138 West Poplar Street, Compton, CA 90220, and served on Torez Bradley, a competent member of the Poplar Street household. On April 27, 2005, Respondent called the Enforcement Division regarding his pending enforcement matter, requesting an extension of time to comply with the filing requirements, and indicating that information regarding this matter should be sent to the Poplar Street address. As required for effective service, the Accusation was also mailed to Respondent on April 30, 2005. Substitute personal service of the Accusation on Respondent Omar Bradley was effective May 10, 2005. The proof of service is attached hereto as “Exhibit C.” Along with the Accusation, the Enforcement Division served Respondent with a “Statement to Respondent,” which notified Respondent that he could request a hearing on the merits and warned Respondent that, unless a Notice of Defense was sent within 15 days of service of the Accusation, Respondent would be deemed to have waived his right to a hearing. More than 15 days have now elapsed and Respondent has not filed a Notice of Defense.

SUMMARY OF THE LAW

An express purpose of the Act, as set forth in section 81002, subdivision (a), is to ensure that the contributions and expenditures affecting election campaigns are fully and truthfully

² The California Administrative Procedure Act is contained in Government Code sections 11370 through 11529.

disclosed to the public, so that voters may be better informed, and so that improper practices may be inhibited. The Act therefore establishes a campaign reporting system designed to accomplish this purpose of disclosure.

Section 82013, subdivision (a) defines a “committee” as any person or combination of persons who directly or indirectly receives contributions totaling \$1,000 or more in a calendar year. This type of committee is commonly referred to as a “recipient” committee. Under section 82016, subdivision (a), a recipient committee that is controlled directly or indirectly by a candidate is a “controlled committee.”

Section 84200 requires a candidate and his or her controlled committee to file two semi-annual campaign statements each year. The first semi-annual campaign statement covers the reporting period January 1 to June 30, and must be filed by July 31. The second semi-annual campaign statement covers the reporting period July 1 to December 31, and must be filed by January 31 of the following year.

As provided in section 84200.5, subdivision (c), all candidates and their controlled committees, for an election that is not being held in June or November of an even-numbered year, shall file pre-election campaign statements according to a schedule set forth at section 84200.8. Section 84200.8, subdivision (a) requires candidates and their controlled committees to file a first pre-election campaign statement no later than forty days before the election, disclosing contributions received and expenditures made occurring up to forty-five days before the election. Section 84200.8, subdivision (b) requires candidates and their controlled committees to file a second pre-election campaign statement no later than twelve days before the election, disclosing contributions received and expenditures made occurring between forty-four and seventeen days before the election. Section 84200.8, subdivision (c) requires that, where there is a run-off election held within 60 days of the qualifying election, candidates and their controlled committees must file an additional pre-election campaign statement no later than 12 days before the run-off election, covering the period ending 17 days before the run-off election.

SUMMARY OF THE FACTS

Respondent Omar Bradley was a candidate for Mayor of the City of Compton in the April 17, 2001, election, and in the June 5, 2001, run-off election. Respondent Bradley previously served as Mayor of the City of Compton from 1993 until his defeat in the June 5, 2001, run-off election. Respondents Committee to Elect Omar Bradley, Committee to Re-elect Omar Bradley Mayor, and Friends of Omar Bradley, were controlled committees of Respondent Bradley.

COUNT 1

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period

January 1, 1999, through June 30, 1999, no later than July 31, 1999. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 1999, in violation of section 84200, subdivision (a).

COUNT 2

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 1999, through June 30, 1999, no later than July 31, 1999. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due July 31, 1999, in violation of section 84200, subdivision (a).

COUNT 3

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 1999, through June 30, 1999, no later than July 31, 1999. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due July 31, 1999, in violation of section 84200, subdivision (a).

COUNT 4

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 1999, through December 31, 1999, no later than January 31, 2000. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due January 31, 2000, in violation of section 84200, subdivision (a).

COUNT 5

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 1999, through December 31, 1999, no later than January 31, 2000. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due January 31, 2000, in violation of section 84200, subdivision (a).

COUNT 6

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 1999, through December 31, 1999, no later than January 31, 2000. According to information

provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due January 31, 2000, in violation of section 84200, subdivision (a).

COUNT 7

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2000, through June 30, 2000, no later than July 31, 2000. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 2000, in violation of section 84200, subdivision (a).

COUNT 8

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2000, through June 30, 2000, no later than July 31, 2000. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due July 31, 2000, in violation of section 84200, subdivision (a).

COUNT 9

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2000, through June 30, 2000, no later than July 31, 2000. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due July 31, 2000, in violation of section 84200, subdivision (a).

COUNT 10

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2000, through December 31, 2000, no later than January 31, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due January 31, 2001, in violation of section 84200, subdivision (a).

COUNT 11

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2000, through December 31, 2000, no later than January 31, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and

Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due January 31, 2001, in violation of section 84200, subdivision (a).

COUNT 12

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2000, through December 31, 2000, no later than January 31, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due January 31, 2001, in violation of section 84200, subdivision (a).

COUNT 13

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200.5, subdivision (c) to file a first pre-election campaign statement covering the period January 1, 2001, through March 3, 2001, no later than March 8, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the first pre-election campaign statement due March 8, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (a).

COUNT 14

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200.5, subdivision (c) to file a first pre-election campaign statement covering the period January 1, 2001, through March 3, 2001, no later than March 8, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the first pre-election campaign statement due March 8, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (a).

COUNT 15

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200.5, subdivision (c) to file a first pre-election campaign statement covering the period January 1, 2001, through March 3, 2001, no later than March 8, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the first pre-election campaign statement due March 8, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (a).

COUNT 16

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200.5, subdivision (c) to file a second pre-election campaign statement covering the period March 4, 2001, through March 31, 2001, no later than April 5, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the second pre-election campaign statement due

April 5, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (b).

COUNT 17

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200.5, subdivision (c) to file a second pre-election campaign statement covering the period March 4, 2001, through March 31, 2001, no later than April 5, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the second pre-election campaign statement due April 5, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (b).

COUNT 18

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200.5, subdivision (c) to file a second pre-election campaign statement covering the period March 4, 2001, through March 31, 2001, no later than April 5, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the second pre-election campaign statement due April 5, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (b).

COUNT 19

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200.5, subdivision (c) to file a pre-election campaign statement prior to the June 5, 2001 run-off election, covering the period April 1, 2001, through May 19, 2001, no later than May 24, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the pre-election campaign statement due May 24, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (c).

COUNT 20

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200.5, subdivision (c) to file a pre-election campaign statement prior to the June 5, 2001, run-off election, covering the period April 1, 2001 through May 19, 2001, no later than May 24, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the pre-election campaign statement due May 24, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (c).

COUNT 21

Respondents Omar Bradley and Friends of Omar Bradley were required under sections 84200.5, subdivision (c) to file a pre-election campaign statement prior to the June 5, 2001 run-off election, covering the period April 1, 2001, through May 19, 2001, no later than May 24,

2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the pre-election campaign statement due May 24, 2001, in violation of sections 84200.5, subdivision (c) and 84200.8, subdivision (c).

COUNT 22

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period May 20, 2001, through June 30, 2001, no later than July 31, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 2001, in violation of section 84200, subdivision (a).

COUNT 23

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period May 20, 2001, through June 30, 2001, no later than July 31, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 2001, in violation of section 84200, subdivision (a).

COUNT 24

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period May 20, 2001, through June 30, 2001, no later than July 31, 2001. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 2001, in violation of section 84200, subdivision (a).

COUNT 25

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2001, through December 31, 2001, no later than January 31, 2002. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due January 31, 2002, in violation of section 84200, subdivision (a).

COUNT 26

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2001, through December 31, 2001, no later than January 31, 2002. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and

Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due January 31, 2002, in violation of section 84200, subdivision (a).

COUNT 27

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2001, through December 31, 2001, no later than January 31, 2002. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due January 31, 2002, in violation of section 84200, subdivision (a).

COUNT 28

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2002, through June 30, 2002, no later than July 31, 2002. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 2002, in violation of section 84200, subdivision (a).

COUNT 29

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2002, through June 30, 2002, no later than July 31, 2002. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due July 31, 2002, in violation of section 84200, subdivision (a).

COUNT 30

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2002, through June 30, 2002, no later than July 31, 2002. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due July 31, 2002, in violation of section 84200, subdivision (a).

COUNT 31

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2002, through December 31, 2002, no later than January 31, 2003. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due

January 31, 2003, in violation of section 84200, subdivision (a).

COUNT 32

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2002, through December 31, 2002, no later than January 31, 2003. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due January 31, 2003, in violation of section 84200, subdivision (a).

COUNT 33

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2002, through December 31, 2002, no later than January 31, 2003. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due January 31, 2003, in violation of section 84200, subdivision (a).

COUNT 34

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2003, through June 30, 2003, no later than July 31, 2003. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due July 31, 2003, in violation of section 84200, subdivision (a).

COUNT 35

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2003, through June 30, 2003, no later than July 31, 2003. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due July 31, 2003, in violation of section 84200, subdivision (a).

COUNT 36

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period January 1, 2003, through June 30, 2003, no later than July 31, 2003. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due July 31, 2003, in violation of section 84200, subdivision (a).

COUNT 37

Respondents Omar Bradley and Committee to Elect Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2003, through December 31, 2004, no later than January 31, 2004. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Elect Omar Bradley failed to file the semi-annual campaign statement due January 31, 2004, in violation of section 84200, subdivision (a).

COUNT 38

Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2003, through December 31, 2003, no later than January 31, 2004. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Committee to Re-elect Omar Bradley Mayor failed to file the semi-annual campaign statement due January 31, 2004, in violation of section 84200, subdivision (a).

COUNT 39

Respondents Omar Bradley and Friends of Omar Bradley were required under section 84200, subdivision (a) to file a semi-annual campaign statement covering the period July 1, 2003, through December 31, 2003, no later than January 31, 2004. According to information provided by the Compton City Clerk's Office, Respondents Omar Bradley and Friends of Omar Bradley failed to file the semi-annual campaign statement due January 31, 2004, in violation of section 84200, subdivision (a).

ADDITIONAL INFORMATION

According to records obtained from the Compton City Clerk's office, on March 14, 2001, the Compton City Clerk sent a notice to Respondent Bradley, by certified mail with a return receipt requested, stating that he had failed to file a campaign statement and instructing him to file the statement by March 20, 2001. A signed receipt was returned to the City Clerk's office, indicating the letter had been received.

On April 2, 2001, the Compton City Clerk's office sent a second notice to Respondent Bradley, by certified mail with a return receipt requested, stating that he had failed to file a campaign statement. Again, a receipt was returned to the Clerk, indicating the letter had been received.

On August 8, 2001, Commission Investigator Larry Phoenix telephoned the Bradley residence and interviewed Robin Bradley, Respondent Omar Bradley's wife, and the treasurer of Respondent Friends of Omar Bradley. Mrs. Bradley stated she was also Respondent Bradley's campaign manager and secretary. She stated that Respondent Bradley had been in politics for at

least ten years and was aware of the filing requirements under the Act. She stated she was aware the committee had failed to file required campaign statements, and that they would do so as soon as possible.

On January 4, 2002, Investigator Phoenix telephoned Respondent Bradley and left a voicemail message for him to return the call. Respondent Bradley did not return the call.

On March 13, 2002, Investigator Phoenix telephoned Respondent Bradley, and learned that the number had been disconnected and a new unpublished number had been issued.

On April 2, 2002, Investigator Phoenix telephoned attorney Bradley Hertz, and left a voicemail message, in an attempt to make contact with Respondent Bradley.

On April 9, 2002, Investigator Phoenix mailed a letter to Respondent Bradley advising him to file his delinquent campaign statements and to contact Investigator Phoenix before May 1, 2002.

On April 11, 2002, Investigator Phoenix received a voicemail message from attorney Bradley Hertz. Mr. Hertz stated that he had contacted Respondent Bradley and advised him to telephone Investigator Phoenix.

On June 4, 2004, the date the probable cause report was issued, Respondent Bradley still had failed to respond to the Enforcement Division's repeated attempts to contact him.

On June 21, 2004, the Enforcement Division received a letter from Respondent requesting a probable cause conference by telephone.

On September 9, 2004, the Enforcement Division received a letter from Respondent Bradley waiving his right to a probable cause conference because his financial documents had been seized by the Los Angeles County District Attorney's Office.

On September 27, 2004, Commission Counsel Steven Meinrath called Respondent's wife to notify her of the Probable Cause finding and reiterate that the Commission would not serve the Accusation on Respondent Bradley until he was out of custody.

On April 27, 2005, Respondent called the Enforcement Division and spoke with Political Reform Consultant Linda Denly. He indicated that he had been sentenced to three years in state prison for credit card fraud and was released in December 2004. He stated that he had recently contacted the District Attorney's office in an attempt to obtain his campaign records. He requested a further extension of time to comply with filing requirements.

After being served with the Accusation and information relating to his right to a hearing upon submitting a Notice of Defense, Respondent Bradley failed to submit a Notice of Defense by May 25, 2005, the end of the 15-day period allowed for this action.

CONCLUSION

This matter consists of 39 counts, which carry a maximum possible administrative penalty of One Hundred Sixty Eight Thousand Dollars (\$168,000).

Regarding the failure to file a semi-annual campaign statement in Counts 1 – 9 (9 counts), the typical penalty for a violation occurring prior to January 1, 2001, has historically ranged from \$1,000 to \$2,000, depending upon the circumstances of the violation. Regarding the failure to file a semi-annual campaign statement in Counts 10 – 12 and Counts 22 – 39 (21 counts), the typical penalty for a violation occurring after January 1, 2001, has historically ranged from \$1,500 to \$5,000, depending upon the circumstances of the violation.³ Regarding the failure to file a pre-election campaign statement in Counts 13 – 21 (9 counts), the typical penalty for a violation occurring after January 1, 2001, has historically ranged from \$2,000 to \$5,000, depending on the circumstances of the violation.

In this matter, the Respondents failed to file required campaign statements over the course of more than four years. Although the requirement to file was imposed on three separate committees, none of Respondent Bradley's committees complied with filing obligations. In addition, since the committees have not filed, it is uncertain what activity they had, if any, over this time period. Accordingly, the facts of this case justify the imposition of an administrative penalty of Seventy Three Thousand Five Hundred Dollars (\$73,500).

³ On January 1, 2001, the maximum administrative penalty amount increased from Two Thousand Dollars (\$2,000) to Five Thousand Dollars (\$5,000) for violations occurring after that date.